

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
C/A No. 1:24-CV-00046-MOC-SCR

Gertrude A. Seigel,

Plaintiff,

v.

Trails Carolina, LLC, Wilderness Training &
Consulting, LLC, and Derry C. O’Kane,

Defendant.

**JOINT MOTION FOR A STATUS
CONFERENCE AND TO MODIFY
THE CASE MANAGEMENT ORDER**

NOW COME the Parties, who jointly ask this honorable Court to enter a modified Pretrial Order and Case Management Plan [Doc. 29] pursuant to Fed. R. Civ. P. Rule 16. The parties have several outstanding motions that impact the pleadings [Doc. Nos. 25 & 27], discovery [e.g. Docs. No. 36, 40, 41, & 43] and the parties’ ability to prepare experts [e.g., Doc. 45]. The parties are scheduled to mediate the case this month in an effort at early resolution, but in the meantime the outstanding motions have impacted the parties’ ability to conduct discovery under the current Case Management Plan. The Parties respectfully request a remote status conference with Judge Rodriguez to discuss the status of the case, early ADR, and the current Case Management Order.

Respectfully submitted:

/s/ Shaun C. Blake

Shaun C. Blake (NC Bar #35819)
ROGERS LEWIS JACKSON & MANN, LLC
1901 Main Street, Suite 1200
Columbia, SC 29201
Phone: (803) 256-1268
Fax: (803) 252-3653
sblake@rogerslewis.com

Attorneys for Plaintiff Gertrude A. Siegel

/s/ David L. Levy

DAVID L. LEVY (NC Bar #34060)
KRISTY D. AMBROSIO (NC Bar # 52817)
Hedrick Gardner Kincheloe & Garofalo, LLP
4201 Congress Street, Suite 300
Charlotte, NC 28209
Phone: (704) 366-1101
Fax: (704) 366-6181
levy@hedrickgardner.com
kdambrosio@hedrickgardner.com

*Attorneys for Defendants Trails Carolina,
LLC, Wilderness Training & Consulting,
LLC and Derry C. O’Kane*

August 1, 2024